Date October 20, 2015

To Executive Directors

 Public Housing Authorities

From Bill Pluta, Director

 Office of Housing Coordination Services, IHDA

CC Bryan Zises, Acting Executive Director, IHDA

Re PHA Housing Authority 5-Year Agency Plans and Annual Plans

 Certification of Consistency with the State Consolidated Plan (AS UPDATED)

As you may know, the Illinois Housing Development Authority’s (IHDA’s) Office of Housing Coordination Services (OHCS) coordinates development of the HUD-required State Consolidated Plan. As such, OHCS also reviews and issues Certifications of Consistency under the State Consolidated Plan for local applications being submitted under a number of HUD (covered) and one DOL (Youthbuild) programs that are located in Non-Entitlement areas, i.e., proposed projects located in municipalities and counties not receiving Community Development Block Grant (CDBG) Entitlement grant funds annually). IHDA serves as the certifying agency, and IHDA’s Executive Director is authorized/designated to sign such certifications in behalf of the Governor. A State that receives CDBG and HOME Program funds must certify that it is following an approved Consolidated Plan. Until passage of the Quality Housing and Work Responsibility Act (QHWRA) of 1998, public housing authorities (PHAs) generally were not required to obtain a Certification of Consistency with the State Consolidated Plan as a condition of any HUD funding. Since then, however, PHAs must obtain such a Certification as part of the 5-Year Agency Plan which is required by QHWRA, from the appropriate State or local jurisdiction. PHAs located in all other areas are covered by the State Consolidated Plan. Please note that PHAs with jurisdiction both within as well as outside of CDBG Entitlement areas will generally require at least two such certifications (State and local).

HUD Notice PIH 2001-26, issued on August 02, 2001, indicates that PHAs are to utilize the Consolidated Plan as the primary data source for identifying the housing needs of its jurisdiction. As this was also relayed in previous HUD guidance, OHCS has also included PHAs in the distribution of the Consolidated Plan and related documents (Action Plan and Annual Performance Report) since the fall of 1999. An electronic copy of the last 5-Year Consolidated Plan (2015-2019) is posted on IHDA’s website ([www.ihda.org](http://www.ihda.org)) under the “Government” link and “Consolidated Plan.” It is effective from January 1, 2015 to December 31, 2019.

Notice PIH 2008-41 (HA) implements Title VII of the Housing and Economic Recovery Act (HERA). Title VII Small Public Housing Authorities Paperwork Reduction Act exempts qualified PHAs from submitting Annual Plans. A qualified PHA: must have less than a combined unit total of 550 public housing units and Section 8 vouchers; is not designated a troubled public housing agency; and has a satisfactory SEMAP scoring for its Section 8/HCV program (if applicable). Qualified PHAs are required to submit a Five-Year Plan at the five-year mark stating their mission and identifying their goals and objectives. Non-Qualified PHAs are required to fully comply with all provisions of the PHA Plan and submit an Annual Plan and Five-Year Plan. Furthermore, for applicable PHAs, PHA Annual Plans are due to HUD 75 days prior to the start of the PHA’s fiscal year, so the Certification needs to be secured before that date. (see PIH 2008-41). For FFY 2015, all PHAs are required to submit a Five-Year Plan.

 State Certification of Consistency Requirements

1. A Complete DRAFT PHA Annual and Five-Year Plan (if applicable) should be sent to IHDA/OHCS. This should be done as soon as the draft document is available, before or at the beginning of the 45-day public display period.

2. Upon receiving the draft document, OHCS will perform a certification review, but cannot have the certification signed until all of the following items are submitted to IHDA/OHCS:

a. A copy of the final PHA Plan Annual and Five-Year Plan (if applicable) - as approved by the PHA Board of Commissioners and as will be submitted to HUD. This must include a cover letter which summarizes any and all significant changes made to the draft LHA Plan(s), or affirms that there were no significant changes made to it (them) as a result of the public display period and public hearing(s).

b. Executed and Approved Board of Commissioners Resolution - The Resolution authorizing submission of the Plan(s) to HUD must be fully executed and approved, for IHDA to process the certification. Please note that this can be in the form of a separate Board Resolution, or submitted as part of the fully completed, signed, and dated “PHA Certifications of Compliance” with PHA plans and related regulations (HUD-50077), along with a resolution number. OHCS must adhere to this requirement in order for the State’s certification to be valid to HUD (i.e., it cannot pre-date the Board of Commissioners Resolution).

c. Completed Attachment A - Required Review Form for Certification of Consistency with the State Consolidated Plan Review. This is attached here for your benefit. It is designed to expedite the review of your plan and the processing of the State certification.

d. Blank Certification Form –

e. Local Consolidated Plan Jurisdictions – Please see Attachment B to determine if your PHA requires a local Consolidated Plan Certification of Consistency.

f. Supplemental Information Review Form - IHDA is also requesting supplemental information to assist with improved coordination of planning and funding with the State. (Attachment C). Please note that this information is not required as part of the certification process, but would be much appreciated.

If you have any questions or comments on the above information requested, please contact one of the OHCS staff persons listed below at your earliest convenience. It remains our intention to make this process as streamlined and convenient as possible for PHAs.

Here is the updated OHCS contact information:

|  |  |  |  |
| --- | --- | --- | --- |
| Bill PlutaDirector, OHCS312-836-5354wpluta@ihda.org | Jennifer Novak ChanAssistant Director, OHCS312-836-5328jnchan@ihda.org  | Pearl MadlockSenior Housing Coordination Officer, OHCS312-836-5262pmadlock@ihda.org  | Burton HughesSenior Housing Coordination Officer, OHCS312-836-5320bhughes@ihda.org |
| OHCS Fax Number: 312-832-2191 |

All correspondence should be sent to the following address:

Illinois Housing Development Authority

Office of Housing Coordination Services

ATTN: Consolidated Plan/PHA Agency Plan

401 North Michigan Avenue, Suite 700

Chicago, Illinois 60611

If the PHA is a reasonable size, the entire plan can be sent as a pdf by e-mail (but please follow-up with OHCS to make sure it was received). If the PHA plan is mailed, allow sufficient time for receipt and review of the plan. Regardless of how the PHA plan is submitted, follow up with OHCS. Also, please allow OHCS five business days to provide the Certification of Consistency. As IHDA’s Executive Director is signing on behalf of the Governor and is the only authorized signatory for these certifications, we need to ensure that ample time is given for same. Also, as multiple PHA plans will be due on the same day based on program year, OHCS generally receives several at once. As such, OHCS will try but cannot guarantee a quicker turnaround time on certifications, so early submission is strongly encouraged.

In addition, all PHAs are requested to complete the IHDA Supplemental Information Review Form (Attachment C) to provide important information on other aspects of PHA operations/management. This information will be initially used statewide and for local/regional needs assessments and market conditions in the State’s Consolidated Plan, for site and market reviews of IHDA multi-family project applications, and for other State program and outreach initiatives. Please note that this information is not required to obtain a PHA certification, but it would be much appreciated.

Please direct any questions to the OHCS staff previously listed. Good luck with the continued development and management of your Agency Plans, your properties, and your programs.

**Attachment A**

**Required Review Form for Certification of Consistency**

**With the State Consolidated Plan Review**

1. What plan does the PHA use?

\_\_\_\_\_\_\_\_Full Plan (HUD-50075) \_\_\_\_\_\_\_\_Streamlined Plan (HUD-50075)

2. Did your PHA use State Consolidated Plan data in formulating your PHA Agency Plan?

\_\_\_\_\_\_yes \_\_\_\_\_\_no

3. What, data, if any did you utilize? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

* Local needs assessment (Please specify)\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

* Census data (source other than Consolidated Plan)\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

* Other (specify) \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 4. Inventory:

* Number of Public Housing Units\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
* Number of Non-HUD/Public Housing Units\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
* Number of Housing Choice Vouchers\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

5. Is or has your PHA been designated as troubled by HUD? (Please provide date(s), brief summary)

Yes/No/Comments\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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 6. If applicable, did your PHA receive a satisfactory SEMAP score from HUD for its most recent review of its HCV Program? Yes/No/Not Applicable/Comments\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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Questions?

Bill Pluta, Director, OHCS 312-836-5354

Jennifer Chan, Assistant Director, OHCS 312-836-5328

Burton Hughes, Senior Housing Coordination Services Officer 312-836-5320

Pearl Madlock, Senior Housing Coordination Services Officer 312-836-5262

**Attachment B**

**Local Consolidated Plan Jurisdictions for FFY 2015 Funding**

Projects located in the following cities and counties require a local Consolidated Plan Certification of Consistency, which should be requested from the city or county in which the project is located, except as noted below (see NOTE). The State (OHCS/IHDA) does not provide Certifications of Consistency for projects located in the following cities and counties.

Cities:

(1) Alton (PE – Madison County Consortium

(2) Arlington Heights

(3) Aurora (PE- DuPage County Consortium)

(4) Belleville (PE – St. Clair County Consortium)

(5) Berwyn (PE – Cook County Consortium)

(6) Bloomington

(7) Bolingbrook

(8) Champaign (PE - Urbana Consortium)

(9) Chicago

(10) Chicago Heights (PE - Cook County Consortium)

(11) Cicero (PE - Cook County Consortium)

(12) Danville

(13) Decatur

(14) DeKalb

(15) Des Plaines

(16) Downers Grove (PE- DuPage County Consortium)

(17) East St. Louis

(18) Elgin (PE – Kane County)

(19) Evanston

(20) Granite City (PE – Madison County Consortium)

(21) Hoffman Estates

(22) Joliet

(23) Kankakee

(24) City of Marion

(25) Moline

(26) Mount Prospect

(27) Naperville (PE - DuPage County Consortium)

(28) Normal

(29) North Chicago (PE - Lake County Consortium)

(30) Oak Lawn

(31) Oak Park (PE - Cook County Consortium)

(32) Palatine

(33) Pekin

(34) Peoria

(35) Rantoul (PE - Urbana Consortium)

(36) Rock Island

(37) Rockford

(38) Schaumburg

(39) Skokie

(40) Springfield

(41) Urbana (LE)

(42) Waukegan (PE – Lake County Consortium)

(43) Wheaton (PE- DuPage County Consortium)

Counties:

(44) Cook County (LE)

(45) Champaign County (PE – Urbana Consortium)

(46) DuPage County (LE)

(46) Kane County

(48) Lake County (LE)

(49) Madison County

(50) McHenry County

(51) St. Clair County (LE)

(52) Will County

PE = Participating Entity in a HOME Consortium LE = Lead Entity of a HOME Consortium

NOTE: A Certification of Consistency for “participating entities” of a HOME Consortium should be obtained from the lead entity. The lead entity for each participating entity is noted beside each participating entity. For lead entity contact information, contact Jennifer Novak at 312/836-5328 or Burton Hughes at 312/836-5320.

**Attachment C**

 **IHDA Supplemental Information Review Form for PHA Agency Plans**

 **for Certification of Consistency with the State Consolidated Plan**

Housing Authority: HUD # \_\_\_\_\_\_\_\_\_\_\_\_\_\_ Draft/Final-\_\_\_\_\_\_\_\_

 FYB- \_\_\_\_\_\_\_\_\_

Due Date to HUD:\_\_\_\_\_\_\_\_

1. Do any of the PHA’s goals indicate that they plan to apply for non- HUD funding?

No \_ Yes \_\_

**2. Public Housing (Demolition/Disposition) Information:**

1. Application status\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Not Applicable\_\_\_\_\_\_\_\_\_\_\_\_
2. The total number of units/buildings: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
3. Are there plans for 1-for-1 replacement? Yes\_\_\_\_\_\_\_ No\_\_\_\_\_\_\_
4. If Yes to B, howmany units/buildings? \_\_\_\_\_\_\_\_\_\_\_\_\_
5. Timetable for Demolition/Disposition: \_\_\_\_\_\_\_\_\_\_

**3**. **Waiting List Information:**

 Section 8 Tenant-Based Assistance/Housing Choice Vouchers\_\_\_\_\_\_\_

 Combined Section 8 and Public Housing\_\_\_\_\_\_

 Public Housing\_\_\_\_\_\_\_\_

 Public Housing Site-Based or Sub-Jurisdictional\_\_\_\_\_\_\_\_\_\_\_\_\_

 # of Families – Section8/Housing Choice Vouchers\_\_\_\_\_\_\_\_\_\_\_

 # of Families –-PH\_\_\_\_\_\_\_\_\_

 **#** of Elderly – Section 8/Housing Choice Vouchers\_\_\_\_\_\_\_\_\_\_\_\_

 # of Elderly – PH\_\_\_\_\_\_\_\_\_\_

 # of Persons with Disabilities: Section 8 Housing/Choice Vouchers\_\_\_\_\_\_\_\_\_\_

 # of Persons with Disabilities: PH\_\_\_\_\_\_\_\_\_

Waiting List Comments: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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Is waiting list open\_\_\_\_\_\_ closed\_\_\_\_\_\_\_\_

If closed, on what date: \_\_\_\_\_\_\_\_\_\_\_\_

4. Accessible Housing: Please indicate number of any and all units by property which meet federal accessible housing standards per Section 504/ADA/FHAA: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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5. Does the PHA indicate that it plans to apply for any IHDA or State-administered funding including LIHTCs?

No Yes If Yes, what programs? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

6. Does your PHA currently have plans to utilize funding sources covered by the State Consolidated Plan?

\_\_\_\_\_\_yes \_\_\_\_\_no

If yes, please note those programs here:

|  |  |
| --- | --- |
| **Programs** | **Other Resources (Non-IHDA)** |
| LIHTC:\_\_\_\_\_\_\_\_\_\_ | HUD/RAD:\_\_\_\_\_\_\_\_\_\_ |
| Affordable Housing Trust Fund:\_\_\_\_\_\_ | USDA-RD:515/RRA/\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| HOME:\_\_\_\_\_\_\_\_\_\_\_\_ | FHLB/(AHP):\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| IAHTC:\_\_\_\_\_\_\_\_\_\_\_\_\_ | Other (Specify):\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Risk Sharing:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |  |
| Other (Specify):\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |  |

 PHA Board Resolution Date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

7. Has the PHA applied for, received planning or implementation, or plan on applying for a HUD Choice Neighborhoods Initiative Program grant?

No Yes\_\_\_\_ Comments\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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7. Does the PHA have an application for Rental Assistance Demonstration (RAD) program

in process, planned, or submitted? If so, which properties are involved & number of units: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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8. Will the PHA be engaging in other mixed-finance activities?

No Yes\_\_\_\_\_ Comments\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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9. Does the PHA have a non-profit affiliate which serves as a development corporation?

 Yes\_\_\_\_ No\_\_\_\_ Name (If applicable)\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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 Current activities? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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10. Any interest in HOME/CHDO designation? Yes\_\_\_\_\_\_\_\_\_ No\_\_\_\_\_\_\_\_\_\_\_

 Comments\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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